

1 RUSS, AUGUST & KABAT  
2 Marc A. Fenster, State Bar No. 181067  
[mfenster@raklaw.com](mailto:mfenster@raklaw.com)  
3 Benjamin T. Wang, State Bar No. 228712  
[bwang@raklaw.com](mailto:bwang@raklaw.com)  
4 Neil A. Rubin, State Bar No. 250761  
[nrubin@raklaw.com](mailto:nrubin@raklaw.com)  
5 James S. Tsuei (CA Bar No. 285530)  
[jtsuei@raklaw.com](mailto:jtsuei@raklaw.com)  
6 12424 Wilshire Boulevard, 12th Floor  
Los Angeles, California 90025  
7 Telephone: (310) 826-7474  
Facsimile: (310) 826-6991  
8  
9 Attorneys for Plaintiff  
10 COREPHOTONICS, LTD.  
11  
12  
13  
14  
15  
16  
17

10 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

11 COREPHOTONICS, LTD.

12 Plaintiff,

13 vs.

14 APPLE INC.

15 Defendant.

16 Case No. 3:17-cv-06457-JD (Lead)  
17 Case No. 5:18-cv-02555-JD

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
**DECLARATION OF JAMES S. TSUEI IN  
SUPPORT OF PLAINTIFF  
COREPHOTONICS, LTD.'S  
SUPPLEMENTAL BRIEF REGARDING  
CLAIM CONSTRUCTION**

RUSS, AUGUST & KABAT

1 I, James S. Tsuei, state as follows:

2 1. I am a member of the State Bar of California and an attorney at the firm of Russ,  
3 August & Kabat, counsel for Plaintiff Corephotonics, Ltd. in the above captioned action. I have  
4 personal knowledge of the facts set forth herein, and if called upon to testify, could and would  
5 testify competently thereto.

6 2. I submit this declaration in support of Corephotonics' Supplemental Brief  
7 Regarding Claim Construction.

8 3. Attached as Exhibit 1 is a true and correct copy of an excerpt from IEEE  
9 Authoritative Dictionary of IEEE Standards Terms (7th edition, 2000), including definitions for  
10 the word "controller."

11 4. Attached as Exhibit 2 is a true and correct copy of Nicholas R. Waltham, Ian G.  
12 van Breda, and Graham M. Newton "Simple transputer-based CCD camera controller", Proc. SPIE  
13 1235, Instrumentation in Astronomy VII, (1 July 1990).

14 5. Attached as Exhibit 3 is a true and correct copy of U.S. Patent Application  
15 Publication 2018/0184005.

16 6. Attached as Exhibit 4 is a true and correct copy of U.S. Patent Application  
17 Publication 2021/0318798.

18 7. Attached as Exhibit 5 is a true and correct copy of U.S. Patent 8,565,709.

19 8. Attached as Exhibit 6 is a true and correct copy of U.S. Patent 10,218,907.

20 9. Attached as Exhibit 7 is a true and correct copy of U.S. Patent Application  
21 Publication 2020/0120261.

22 10. Attached as Exhibit 8 is a true and correct copy of the Reexamination Certificate  
23 for U.S. Patent 9,185,219, dated June 30, 2023.

24 I declare under penalty of perjury under the laws of the United States the foregoing is true  
25 and correct.

26  
27  
28

1 Executed on July 10, 2022 in Los Angeles, California.  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

By: /s/ James S. Tsuei  
James S. Tsuei

RUSS, AUGUST & KABAT